

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust
Litigation*, MDL 2817

This document relates to:
ALL PENDING CASES

No. 1:18-CV-864

Hon. Robert M. Dow, Jr.

Magistrate Judge Jeffrey T. Gilbert

**COUNTERCLAIMANT THE REYNOLDS AND REYNOLDS COMPANY’S ERRATA
LIST AND CORRECTED EXHIBITS TO MOTION FOR PARTIAL SUMMARY
JUDGMENT**

On October 15, 2019, Counterclaimant The Reynolds and Reynolds Company filed a Motion for Partial Summary Judgment and accompanying LR 56.1 Statement of Undisputed Material Facts. In hyperlinking the brief for the convenience of the Court and the parties, Reynolds identified minor errors in the exhibits attached to that filing. Reynolds submits the following errata list for the partial summary judgment papers. The hyperlinked version of the brief concurrently served today is linked to the corrected versions identified below.

- **Memorandum in Support of Motion for Partial Summary Judgment (Dkt. 785 – sealed version; Dkt. 804 – public version)**
 - Page 11 n.28: The exhibit matching to the citation to “Def. Ex. 6 (Death by CAPTCHA website)” was inadvertently omitted from Rule 56.1 SUF and supporting materials; a supplemental Exhibit 6A is attached to this filing and the forthcoming hyperlinked brief that will be submitted to the Court will link to the supplemental Exhibit.
 - Page 25 n.83: The note text “*id.* at 98:24-99:2 [REDACTED] [REDACTED] should read <Ex. 28 (Clements Tr.) at 98:24-99:2 [REDACTED] [REDACTED]
- **LR 56.1 Statement of Undisputed Material Facts and supporting exhibits**

- Page 6 ¶ 14: The reference to “Declaration of S. Cottrell [Auth. Dkt. 51]” should read <Declaration of S. Cottrell [Auth. Dkt. 62]>. The hyperlinked brief that will be submitted to the Court will link to Authenticom Docket 62.
- Page 13 ¶ 37: The reference to “Ex. 67, AUTH_00092111” should read <Ex. 67, AUTH_00092142>. (The corresponding Exhibit 67 to the LR 56.1 Statement accurately contains AUTH_00092142.)
- Page 15 ¶ 49: The reference to “Ex. 82 (February 19, 2007 Automotive News Article)” should read <Ex. 17 (February 19, 2007 Automotive News Article)>. The hyperlinked brief that will be submitted to the Court will link to Exhibit 17.
- Exhibit 2: Pages 68-70 of the Deposition of Christopher Kirby transcript were inadvertently omitted.
- Exhibit 23: Pages 42-44 of the 30(b)(6) Deposition of The Reynolds and Reynolds Company (K. Hall) transcript were inadvertently omitted.
- Exhibit 28: Page 98 of the Deposition of Brian Clements transcript was inadvertently omitted.
- Exhibit 29: Pages 98-99 and 199-200 of the Deposition of Steven Cottrell transcript were inadvertently omitted.
- Exhibit 39: Pages 25-26 of the Deposition of William Munns transcript were inadvertently omitted.

Corrected versions of these exhibits, containing true and correct copies of the inadvertently omitted transcript pages in addition to the original excerpts, are attached to this filing.

Dated: June 17, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on June 17, 2020, I caused a true and correct copy of the foregoing **COUNTERCLAIMANT THE REYNOLDS AND REYNOLDS COMPANY'S ERRATA LIST AND CORRECTED EXHIBITS TO MOTION FOR PARTIAL SUMMARY JUDGMENT** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by email to all parties at the following email address: SERVICE-EXTERNAL-DMS-MDL@lists.kellogghansen.com.

/s/Justin D. Patrick
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